

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA
RIBEIRO, as individuals and as next
friends and biological parents of
LUCAS RIBEIRO, an infant,

Plaintiffs,

vs.

BABY TREND, INC., a corporation,
HOLMBERGS CHILDSAFETY CO.,
LTD., f/k/a KENDRON SAFETY
FUNCTIONS, CO., LTD., MARK
SEDLACK, MILLENNIUM
DEVELOPMENT CORP., INDIANA
MILLS & MANUFACTURING, INC.,
and LERADO GROUP CO., LTD.,

Defendants.

CASE NO. 8:12cv204

**UNOPPOSED MOTION
TO FILE
THIRD AMENDED COMPLAINT**

COME NOW the Plaintiffs, through undersigned counsel, and state the following in support of their Unopposed Motion to File Third Amended Complaint:

1. Plaintiffs attach a copy of the proposed Third Amended Complaint adding Defendants Lerado Group (Holding) Company Ltd., Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Limited, and Lerado H.K. Limited as Defendants and amending paragraph 7 of Plaintiff's Second Amended Complaint.
2. Plaintiffs received a Certificate of Service dated February 13, 2014, from the Chinese Central Authority, stating that service upon Lerado Group Co., Ltd. could not be obtained because the entity at that address contended it is a branch factory of Lerado Group Co., Ltd., and not the entity itself. Plaintiff filed a Return of Service regarding the same. (Filing no. 88).

3. Based upon subsequently obtained information, Plaintiffs seek to add Lerado Group (Holding) Company Ltd., Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Limited, and Lerado H.K. Limited as Defendants in this matter.
4. Opposing counsel on record have informed there are no objections to this Motion.

WHEREFORE, Plaintiffs respectfully request this Court grant this Unopposed Motion to file the attached Third Amended Complaint.

DATED this 9th day of April, 2014.

FRANCO RIBEIRO and DEANNA RIBEIRO,
as individuals and biological parents and next
friends of LUCAS RIBEIRO, an infant, Plaintiffs

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically with the United States District Court for the District of Nebraska on April 9th, 2014, using the CM/ECF system which sent notification of such filing to the following:

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